# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

PARKERVISION, INC.,

Plaintiff,

Case No. 6:23-cv-00375-ADA

v.

MEDIATEK INC. and MEDIATEK USA INC.,

Defendants.

**JURY TRIAL DEMANDED** 

## JOINT MOTION TO STAY PENDING INTER PARTES REVIEW

Plaintiff ParkerVision, Inc. ("ParkerVision") and Defendants MediaTek Inc. and MediaTek USA Inc. (collectively, "MediaTek") jointly move the Court to stay all deadlines in this case until after the PTAB issues Final Written Decision in the IPR Proceedings of the three patents-in-suit, IPR2024-00796, IPR2024-00935, IPR2024-00936, which are expected no later than November 26, 2025. All asserted patent claims of the patent-in-suit are subject to these instituted IPRs, and the parties expect that resolution of these IPRs will provide clarity to, narrow, or resolve all remaining issues in the case.

This Court recently entered a Second Amended Scheduling Order rescheduling trial in this case from October 27, 2025, to November 16, 2026. (D.I. 90.) The Patent Trial and Appeal Board ("PTAB") is expected to issue Final Written Decisions on all three Asserted Patents in this case by November 26, 2025—nearly a full year before trial. See 35 U.S.C. § 316(a)(11) (setting a one-year deadline from institution to Final Written Decision); IPR2024-00796, Paper 9 (instituting review of the '686 patent on November 26, 2024); IPR2024-00935, Paper 9 (instituting review of the '177 patent on November 26, 2024); IPR2024-00936, Paper 9 (instituting review of the '528 patent on November 26, 2024).

Significant expense and resources are yet to be incurred in this case, including depositions of most of the fact witnesses, expert reports, expert discovery, dispositive motions, pretrial, and trial. Accordingly, the parties agree that it would be more efficient to stay the case now. Should any claims remain to be litigated in the district court after the completion of the IPR proceedings, the parties will begin by completing fact discovery in the case.

Additionally, the parties note that the Court has already granted a contested stay motion over two of three asserted patents in the related NXP case (No. 6:23-cv-00389, D.I. 110) and approved a jointly requested stay in the Texas Instruments case (No. 6:23-cv-00384, D.I. 134).

Therefore, ParkerVision and MediaTek respectfully request the Court to grant their motion to stay all deadlines in this case until the PTAB issues its Final Written Decisions. The parties further propose filing a joint report within 30 days of the last Final Written Decision in which the parties will outline their positions on the status of the IPRs and their impact on this case.

#### Dated: July 2, 2025

### Respectfully submitted,

/s/ Raymond W. Mort, III
Raymond W. Mort, III
Texas State Bar No. 00791308
THE MORT LAW FIRM, PLLC
111 Congress Avenue, Suite 500
Austin, Texas 78701
Tel/Fax: 512-865-7950
raymort@austinlaw.com

#### OF COUNSEL:

Ronald M. Daignault\* (pro hac vice) Chandran Iyer (pro hac vice) Jason Charkow\* (pro hac vice) Scott Samay\* (pro hac vice) Stephanie Mandir (pro hac vice) Austin Ciuffo\* (pro hac vice) DAIGNAULT IYER LLP 8229 Boone Boulevard, Suite 450 Vienna, VA 22182 rdaignault@daignaultiyer.com cbiyer@daignaultiyer.com jcharkow@daignaultiyer.com ssamay@daignaultiyer.com smandir@daignaultiyer.com aciuffo@daignaultiyer.com \*Not admitted in Virginia

# ATTORNEYS FOR PARKERVISION, INC.

#### PERKINS COIE LLP

/s/ Kyle R. Canvera
Kyle R. Canavera
(CA Bar No. 314664)
kcanavera@perkinscoie.com
Abigail A. Gardner
(CA Bar No. 334598)
agardner@perkinscoie.com
Eric Maas
(CA Bar No. 345450)
EMaas@perkinscoie.com
11452 El Camino Real, Suite 300
San Diego, CA 92130-2080
Tel. (858) 720.5700
Fax (858) 720.5799

Ramsey M. Al-Salam (WA Bar No. 18822) Christina J. McCullough (WA Bar No. 47147) Kevin A. Zeck (WA Bar No. 41689) kzeck@perkinscoie.com 1201 Third Ave, Suite 4900 Seattle, WA 98101 Tel. (206) 359.8000 Fax (206) 359.9000

#### **BERSTEIN IP STRATEGY**

Matthew C. Bernstein (CA Bar No. 199240) Matt@BernsteinIPStrategy.com 14161 Caminito Vistana San Diego, CA 92130

ATTORNEYS FOR DEFENDANTS AND COUNTERCLAIM PLAINTIFFS MEDIATEK INC. AND MEDIATEK USA INC.